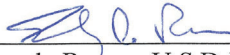




MEMO ENDORSED

Plaintiff is directed to file a motion for default judgment against Bluestem by May 25, 2022. SO ORDERED.



Edgardo Ramos, U.S.D.J.
Dated: April 28, 2022
New York, New York

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GARDEN CITY, NEW YORK 11530
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April 28, 2022

Via ECF

Hon. Edgardo Ramos
United States District Judge
U.S. District Court, Southern District of New York
500 Pearl Street
New York, New York 11201

Re: *Kim v. Bluestem Brands Inc, et.al.*
Docket No: 1:21-cv-04637-ER
Status Letter and Request for Extension to File Motion

Dear Judge Ramos:

We are the attorneys for Plaintiff in this matter. We apologize for not proceeding with default judgment against Defendant Bluestem Brand Inc. ("Bluestem") sooner and missing the deadline to file this status letter. Our office has since been trying to get in touch with previous counsel for Bluestem in order to avoid a default and resolve the case on the merits or more expeditiously work to find a reasonable resolution that remedies our client.

As the Court is aware, our office was successful in resolving this matter with the other Defendants in this action and Bluestem is the sole remaining Defendant. Unfortunately, we have been unable to receive a substantive response from a representative of Bluestem and are not aware of their intentions with regard to filing an appearance. As such, we respectfully request the Court's grace in approving an extension for Plaintiff to file a motion for default judgment against Bluestem by May 25, 2022.

Thank you for your time and consideration of this request.

Respectfully submitted,

/s/ Alain Cesar
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Direct: 516-203-7612